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October 21, 2008

Thomas Nash, Associate Regional Counsel
U.S. Environmental Protection Agency
Region 5, C-14J
77 West Jackson Blvd.
Chicago, IL 60604

Re: Special Notice Letter for the Chemical Recovery Systems (CRS) Site, Elyria, Ohio
Superior Screw/ Superior Products, Inc.

Dear Mr. Nash:

This is in response to the Special Notice Letter dated August 21, 2008. We represent Superior Products, Inc., an Ohio corporation. It is not clear to us whether Superior Products, Inc. has any connection to this Site. The Dirty Inventory lists a "Superior Screw", but it is not clear whether that refers to Superior Screw Products Company, formerly of Brooklyn, Ohio, or Superior Screw Machine Products, Inc. of Elk Grove, IL. Both of these companies are listed in the General Notice.

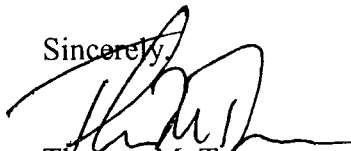
If "Superior Screw" refers to the Illinois company, our client, Superior Products, Inc., has absolutely no connection to that company. If the "Superior Screw" in the Dirty Inventory is Superior Screw Products Company, we would be happy to provide you with documents showing that this Ohio corporation went out of business in 1992 and liquidated and dissolved in 1997. Superior Products, Inc. purchased most of the assets of Superior Screw Products Company in 1992, but did not assume any liabilities. Superior Products, Inc. denies liability as the "successor" to Superior Screw Products Company.

Finally, if it is determined that Superior Screw Products Company contributed to the CRS Site, the contribution of "1000 gallons of Fast Dry Mineral Spirits" as stated in the Dirty Inventory is truly de minimis in the context of the total CRS Site (0.022% of the total). Despite our denial of liability for the actions of Superior Screw Products Company, we are willing to consider a de minimis offer to settle.

Mr. Thomas Nash
October 21, 2008

It is our understanding that a de minimus offer for "Superior Screw" was sent to the Elk Grove, Illinois, address in December of 2002. If the company that operated at that address is the PRP identified in the Dirty Inventory, Superior Products, Inc. should be dismissed from this action and removed from the PRP list, since it never had a connection to that company. However, if the de minimus offer was intended for Superior Screw Products Company, but sent to the wrong address, we would be happy to receive it and consider it now. We understand that a new round of de minimus offers is not a small matter for the EPA procedurally. But if the original de minimus offer was intended for our client, but sent to the wrong company and address, could that original offer could be resent?

It is our client's desire to cooperate with the EPA and resolve this matter. We look forward to hearing from you.

Sincerely,

Thomas M. Turner

Cc: Mary Tierney